

EXHIBIT “A”
Affidavit of Pamela Schreiner

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

**DAVID R. WILSON and
CHARLENE WILSON,**

Plaintiffs,

V.

TASER INTERNATIONAL, INC.,

Defendant.

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**CIVIL ACTION
FILE NO. 4:06-CV-179-HLM**

AFFIDAVIT OF PAMELA SCHREINER

Personally appeared before me, an officer duly authorized to administer an oath, **PAMELA SCHREINER**, who, after being sworn, states the following:

1.

My name is Pamela Schreiner. I am of age, competent to make this Affidavit, and do so based upon my personal knowledge.

2.

On March 4, 2004, I was hired as an Executive Legal Assistant to the executive team at TASER International, Inc. I reported to Doug Klint, corporate counsel, Rick Smith, CEO, and Tom Smith, the company's president. This was a newly created position.

3.

One of the first duties assigned to me was to organize a huge number of volunteer exposure reports, which were in numerous boxes scattered throughout the offices. These volunteer exposure reports were documents filled out by law enforcement persons who attended trainings throughout the country and were exposed to the effects of the TASER. The volunteer exposure reports contained a section where the officer could indicate whether or not he/she was injured by the exposure.

4.

I was instructed by Doug Klint to create a spreadsheet from the information contained on the volunteer exposure reports. I created tabs for documents which indicated injuries from the TASER exposure.

5.

While creating the spreadsheet, I became aware that there were hundreds, if not thousands, of injuries noted on the volunteer exposure reports. When Doug Klint and Rick Smith learned of the volume of injuries they became visibly concerned and upset. At that time, the S.E.C. and the Department of Justice were investigating the company concerning the safety of the device. Mr. Klint and Mr. Smith told me to remove the data from the spreadsheets for most of the injuries which I had entered. They then shredded most of the reports showing injuries,

bringing in dumpsters to dispose of the paper. Many of the destroyed documents contained reports of injuries to the back.

6.

In late 2004, Rick Smith called a meeting of all of the employees of TASER International. Mr. Smith informed the employees that company management believed that someone was leaking information concerning the S.E.C./D.O.J. investigation to the press. Mr. Smith stated that the company was hiring off duty police officers to investigate and determine who the person leaking information was. In December of 2004, I was taken off TASER International's premises to another location and confronted by two Chandler, Arizona police officers, who accused me of leaking the investigation to the press. Although I was not responsible for giving information to the press, I was forced to resign.

7.

Since leaving TASER International, I have been verbally threatened by people hired by TASER to harass and intimidate me. I was told by the two Chandler police officers that they had conducted a surveillance of my residence, followed me around, and gone through my garbage. I was confronted at the grocery store by someone I had never met and told that it would not be a good idea for me to be testifying against TASER. In the summer of 2005, shortly before

giving my deposition in the Powers v. TASER case, a window was shot out of my residence.

8.

Rick Smith, Tom Smith, and Doug Klint are responsible for hiding and covering up information on the extent of injuries to officers during TASER trainings. I know this because I was instructed to alter the spreadsheets and saw them destroy documents. Doug Klint told me that the lawsuits against TASER would go away because there would be no documents to prove that TASER knew that injuries were happening.

9.

Since leaving TASER International, I have lived in fear of what TASER International will do to me. The company has enormous resources and connections throughout law enforcement.

FURTHER AFFIANT SAITH NOT.


PAMELA SCHREINER

Sworn to and Subscribed
Before Me this 24th day
Of July, 2007.


Notary Public

